

1 ROBERT W. FREEMAN
2 Nevada Bar No. 3062
3 LEWIS BRISBOIS BISGAARD & SMITH LLP
4 6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
702.893.3383
4 FAX: 702.893.3789
5 Attorneys for Defendant
Clark County

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 * * *

9 MICHAEL WARE,
10 Plaintiff,
11 vs.
12 CLARK COUNTY, NEVADA
13 Defendants.

14
15 CASE NO. 2:13-cv-00958-JAD-PAL
16 **STIPULATION AND ORDER TO EXTEND**
17 **THE TIME FOR THE PARTIES TO FILE**
18 **PRE-TRIAL MEMORANDUM**
19 **(FIRST REQUEST)**

20 COMES NOW, Plaintiff and Defendant, by and through their counsels of record, and
21 pursuant to Local Rule 6-1, the parties hereby stipulate, agree, and make joint application to
22 extend the time for the parties to file their Pre-Trial Memorandum.

23 This extension is based on the following:

24 On February 3, 2015, the Court denied Defendant's Motion for Summary Judgment
25 and Plaintiff's Motion for Partial Summary Judgment.

26 Upon ruling on the above-mentioned motions, the Court ordered the parties to file
27 their pre-trial memorandum within thirty (30) days.

28 The Court also ordered the parties to a settlement conference mediation with a U.S.
Magistrate Judge.

29 On February 5, 2015, Magistrate Judge Peggy A. Leen ordered a settlement
30 conference set for May 21, 2015. See Dkt. No. 47.

1 In order to follow this schedule, the parties would be required to expend time and
2 resources on preparing a pre-trial memorandum more than two months prior to the ordered
3 settlement conference where all or some of the issues in the case may be resolved.

4 This extension is made in good faith and not for purposes of delay. Based upon the
5 foregoing, the parties request that this Court order the time for the parties to file their Pre-
6 Trial Memorandum be extended to thirty (30) days after the settlement conference if
7 necessary. The new deadline for the Pre-Trial Memorandum will be June 22, 2015.

8 DATED this 12th day of February, 2015. DATED this 12th day of February, 2015.

9 LEWIS BRISBOIS BISGAARD SMITH LLP LAW OFFICES OF DANIEL MARKS

10 /s/ Robert W. Freeman

11 Robert W. Freeman, Esq.
12 Nevada Bar No. 3062
13 6385 S. Rainbow Blvd., #600
14 Las Vegas, Nevada 89118
15 Attorneys for Defendant

16 /s/ Daniel Marks

17 Daniel Marks, Esq.
18 Nevada Bar No. 2003
19 610 South Ninth Street
20 Las Vegas, Nevada 89101
21 Attorneys for Plaintiff

22 **ORDER**

23 IT IS SO ORDERED.

24 Dated this 13 day of February, 2015.

25 
26 U.S. MAGISTRATE JUDGE